General Machine 116005 92

PHILLIPS, LYTLE, HITCHCOCK, BLAINE & HUBER

ATTORNEYS AT LAW

3400 MARINE MIDLAND CENTER, BUFFALO, NEW YORK 14203

(716) 847-8400

June 13, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael Towle-3HW12
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region III
841 Chestnut St.
Philadelphia, PA.19107

Re: Novak Sanitary Landfill Site
Lehigh County, Pennsylvania

Dear Mr. Towle:

We are counsel for General Machine Corporation (General Machine) with respect to the above matter. This is in response to the letter of Stephen R. Wassersug, Director Hazardous Waste Management Division, U.S. Environmental Protection Agency, Region III, dated May 5, 1988, and a followup to our letter dated May 5, 1988 to Joseph Donovan, Esq.

With respect to Mr. Wassersug's request for further information, General Machine provided all available documentation pertaining to this Site in its letters to you dated October 22, 1987 and October 27, 1987. We trust that you do not want the exact same documents (copies of accounts payable records) sent to you a second time. Enclosed again, however, is a copy of a two-page analytical report dated July 12, 1985, from AGES Laboratories pertaining to the foundry sand and slag. This report was sent to you on October 27, 1987.

With respect to EPA's specific questions, the following numbered responses correspond with Mr. Wassersug's numbering:

1. The best available information, namely, the relevant accounts payable records, have already been provided to you. These records indicate General Machine's use of Valley Disposal at various times during the time period 1978 through 1980. There is no available information concerning the extent to which Valley Disposal may have utilized Novak Sanitary Landfill

204403

for disposal of General Machine's waste. There is no additional available information or documentation pertaining to Novak Sanitary Landfill or Valley Disposal.

2. General Machine is a metal fabricator. General Machine fabricates sheet and plate steel into finished product. The machine shop produces waste steel chips, steel filings or shavings, sheet drop-off and steel plate. The machine shop also produces limited amounts of spent oils and solvents.

3. During the time period the Emmaus Foundry was operating, until August, 1985, much of the fabricated metals waste was used in the foundary operation, and melted down for metal castings. The fabricated metals wastes have also been removed from General Machine and sold to such companies as Sussman Bros. and Co., 2-4 Allen St., P.O. Box 24, Allentown, PA., as reusable scrap steel. The spent oils and solvents have been removed from General Machine and transported to:

Hydrocarbon Recyclers, Inc.,
5354 West 46th St. South
Tulsa, Oklahoma 74107
EPA No. OKD000632737;

Chem-Met Services, Inc.
18550 Allen Rd.
Wyandotte, Michigan 48192
EPA No. MID096963194;

Spectron, Inc.
111 Providence Road
Elkton, MD
EPA No. MDD090218008.

4. While the Emmaus Foundry was operating, the general practice was to always manage (contain, store, transport) and dispose of foundry wastes separately from the machine shop wastes.

5. The identity and concentration of halogenated organic compound in waste sent to Novak Sanitary Landfill, if any, is unknown. At this time, the only available information concerning the nature of materials hauled by Valley Disposal, other than what has been provided in this response and General Machine's October 22 and 27, 1987 responses, is contained in the enclosed report from AGES Laboratory.

Mr. Wassersug's letter also discusses the performance by EPA, or one or more of the identified potentially responsible parties, of a remedial investigation/feasibility study (RI/FS).

General Machine was informed of the planned RI/FS for this Site for the first time only after it reviewed Mr. Wassersug's May 5, 1988 letter. We have learned that other PRP's have known about the planned RI/FS since January or February, 1988, and have been discussing this matter with EPA.

Since receipt of the May 5, 1988 letter, General Machine has endeavored to "get up to speed" with the other PRPs, and has actively participated in meetings and discussions with most of the PRPs identified by EPA. You will note that General Machine joined in the letter to Mr. Donovan dated May 27, 1988, which discusses a number of important technical and legal issues concerning RI/FS participation.

Although EPA has only recently notified General Machine of the planned RI/FS by its letter dated May 5, 1988, EPA has placed a deadline on General Machine to submit this response by June 13, 1988. At this writing, the PRPs are continuing to confer amongst themselves with respect to RI/FS participation. These discussions are presently scheduled to continue after this response is mailed and further communications with EPA may be forthcoming from General Machine. At this juncture, however, it is premature for General Machine to commit to performing with others the RI/FS presently believed to be envisioned by EPA.

Further communications concerning this matter should be directed to:

Morgan G. Graham, Esq.
Phillips, Lytle, Hitchcock, Blaine & Huber
3400 Marine Midland Center
Buffalo, New York 14203
Telephone: (716) 847-7070

Finally, we hereby request any and all documents or other information in the possession or control of EPA, EPA Region III or any of its contractors or consultants with respect to this Site and General Machine Corporation and/or the Emmaus Foundry & Machine Division, Emmaus, Pennsylvania.

Very truly yours,

PHILLIPS, LYTLE, HITCHCOCK, BLAINE & HUBER

By Morgan G. Graham
Morgan G. Graham

DDDar
Enclosure

AGES LABORATORIES
1151 S. Trooper Road, Norristown, PA 19403 (215) 666-7404
Engineering Consultants – Analytical Services

ANALYTICAL REPORT
July 12, 1985

Emmaus Foundry
4th & Furnace Sts.
Emmaus, PA 18049

Attn: Lin Nester

AGES Project No. 45685

Re: Analysis of Composite Samples
Submitted 6/27/85
AGES Lab I.D. No. 852207

	Total (As Received)	E.P. Toxicity Leachate
Antimony	---	0.194mg/l
Arsenic	0.944 mg/kg	<0.001 mg/l
Barium	3.70 mg/kg	0.153 mg/l
Cadmium	0.947 mg/kg	0.011 mg/l
Chromium, total	24.6 mg/kg	0.038 mg/l
Chromium, Hexavalent	---	0.038 mg/l
Copper	24.1 mg/kg	0.025 mg/l
Lead	16.3 mg/kg	0.072 mg/l
Mercury	0.0124 mg/kg	0.0008 mg/l
Molybdenum	19.9 mg/kg	<0.019 mg/l
Nickel	171. mg/kg	0.09 mg/l
Selenium	<0.010 mg/kg	<0.001 mg/l
Silver	0.756 mg/kg	0.010 mg/l
Zinc	44.1 mg/kg	<0.119 mg/l
COD	---	4097. mg/l
TOC	---	1028. mg/l
pH	10.55	4.80
Cyanide	2.87 mg/kg	0.14 mg/l

204406

LABORATORY SAMPLES ARE RETAINED BY AGES LABORATORIES FOR 30 DAYS FROM THE DATE OF THIS ANALYTICAL REPORT.

Re: Analysis of Composite Samples
Submitted 6/27/85
AGES Lab I.D. No. 852207

	Total (As Received)	E.P. Toxicity Leachate
Phenol	---	0.15 mg/l
Oil & Grease	309. mg/kg	(5. mg/l
Ammonia Nitrogen as N	---	0.74 mg/l
Total Solids	95.96%	3853. mg/l
Volatile Solids	2.92% (% of T.S.)	2083. mg/l
BTU	None Found	---
Flash Point	Greater than 600 C	---
TOX	---	196. ug/l

E.P. Toxicity Leachate Procedure:

E.P. Toxicity Leachate is prepared according to the procedure outlined in the Federal Register, May 19, 1980, paragraph 261.24 and Appendix II. The leachate is prepared by mixing an aliquot of the sample with 16 times the sample weight of ASTM Class I water and agitating, while maintaining the pH of the mixture at 5.0 ± 0.2 for twenty-four hours. A pH adjustment is made if necessary with 0.5 N Acetic Acid with no more than 4 times the sample weight added to the mixture. The mixture is then adjusted to a final volume of 20 times the sample weight with ASTM Class I water. The amount of 0.5 N Acetic Acid added is included in the final adjustment volume. The mixture is pressure filtered through 0.45 micron filter media at a maximum pressure of 75 psi.

Initial pH: 5.38
Final pH: 5.01
Amount of Acetic Acid used: 20. mls
Amount of sample leached: 100. grams

Reactivity - the sample did not react violently or generate gases when mixed with water.

EPA Method for Reactive Cyanide and Sulfide in waste
- H_2S - 0. ppm/g
- HCN - 43. ppm/g

204407

Based on the above results, the sample does not exhibit the characteristics of Ignitibility, Corrosivity, or E.P. Toxicity but is slightly reactive for HCN as outlined in the Federal Register, May 19, 1980.

AGES